

Exhibit B

LANKLER SIFFERT & WOHL LLP

500 FIFTH AVENUE
NEW YORK, N.Y. 10110
+1.212.921.8399
WWW.LSWLAW.COM

WRITER'S DIRECT CONTACT:
+1.212.930.1247
GFRIEDMAN@LSWLAW.COM

Andrew Shen
Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.
Sumner Square
1615 M Street N.W.
Suite 400
Washington, D.C. 20036-3215

Re: **In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)**

Dear Andy:

As you know, we represent non-party John Fawcett in the proceeding related to the above-captioned matter. I write in regarding the discovery and other information requests in connection with the hearing scheduled for November 1 and 2, 2021.

Initial Production

In response to the Court's Order dated October 21, 2021 (ECF No. 7277) ("October 21, 2021 Order") regarding discovery for the hearing, enclosed please find responsive, non-privileged materials bearing Bates numbers JFawcett_0000001-JFawcett_0000021. These materials, stamped CONFIDENTIAL AND SUBJECT TO PROTECTIVE ORDER, are to be treated as confidential material pursuant to the Protective Orders in this case dated October 3, 2006 (ECF No. 1900) and November 14, 2018 (ECF No. 4255).

In addition to this production, consistent with the October 21, 2021 Order, we have provided certain potentially responsive materials to counsel to Kreindler & Kreindler LLP ("Kreindler Firm"), for its review for privilege and/or work product protection. We have also requested that the Kreindler Firm advise us as to whether any of these materials should be provided to the PECs for the PECs' determination as to whether to assert privilege or work product protection.

Following that review, we will supplement our production as appropriate, including to the extent we identify additional responsive, non-privileged documents. We will also produce a Privilege Log on behalf of Mr. Fawcett that, consistent with the October 21, 2021 Order, reflects any privilege or work product protection asserted by the Kreindler Firm or the PECs over responsive materials in Mr. Fawcett's possession. None of the information we are providing is intended to constitute a waiver of any privilege or work product protection. Any production of privileged or otherwise protected documents is inadvertent.

KSAX-0023

Case No.
03-md-1570

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Forensic Status Report

As you know, with the Court's permission (ECF No. 7261), LSW has retained StoneTurn Group LLC ("StoneTurn"). Attached to this letter is a forensic status report from StoneTurn (the "StoneTurn Report") regarding searches of Mr. Fawcett's personally owned devices performed at the Court's direction. We are producing the StoneTurn Report pursuant to the direction of the Court, and without waiver of any privilege or work product protection. The StoneTurn report, marked "Confidential," is to be treated as such pursuant to the Protective Orders in this case dated October 3, 2006 (ECF No. 1900) and November 14, 2018 (ECF No. 4255). With respect to the StoneTurn Report, please note that StoneTurn has advised that files contained in the Recycle Bin on Mr. Fawcett's computer are not deleted files and are considered active files. As such, these files—which may be opened by the user without need for any forensic tools—would not be identified in a forensic search for deleted files.

Confidential Materials

With respect to your request regarding whether Mr. Fawcett has access to materials designated as Confidential by Saudi Arabia, as an update, Mr. Fawcett has returned to the Kreindler Firm, at its request and via counsel, the external storage devices in his possession that contained 9/11 case-related materials. One such device remains in the custody of LSW, as it may also contain confidential work product that belongs to a different and unrelated client of Mr. Fawcett's research firm, Humanitarian Research Services, Inc.

We have also learned that in connection with his work for the Kreindler Firm, which included managing case-related documents for the Kreindler Firm, Mr. Fawcett had access to and maintained a secure archive of case-related materials on a platform called Tresorit, which is a Swiss end-to-end encrypted content storage platform on the cloud designed for the secure storage of sensitive materials. In an excess of caution, we have directed StoneTurn to access the Tresorit storage platform and create a forensic image, so that the content may be secured, and if necessary reviewed and returned to the Kreindler Firm.

Owing to the pace of forensic review and discovery, we are still gathering information regarding the extent to which any materials designated as confidential may be present in Mr. Fawcett's personal emails or on his personal devices.

Sincerely,

/s/ Gabrielle S. Friedman
 Gabrielle S. Friedman

Enc.

cc: Emily Kirsch, Esq., Kirsch & Niehaus
 Sean Carter, Joseph Tarbutton, Cozen O'Connor
 Robert Haefe, Jodi Flowers, John Eubanks, Motley Rice

